



Gravesham Borough Council  
Planning & Regeneration Services  
Civic Centre  
Windmill Street  
Gravesend  
Kent  
DA12 1AU

E-mail: Alistair.hendry@kent.police.uk

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Ref: 20250618/AH.2/G-343

Location: Ashley Down Nursing Home 29 Clarence Place Gravesend Kent DA12 1LD  
Proposal: Change of use from Residential Care Home for the Elderly to Residential Care Home for Young People.

We have reviewed this application in regard to Crime Prevention Through Environmental Design (CPTED) and in accordance with the National Planning Policy Framework (NPPF).

Applicants/agents should consult us as Designing out Crime Officers (DOCO's) to address CPTED and incorporate Secured By Design (SBD) as appropriate. We use details of the site, relevant crime levels/type and intelligence information to help design out the opportunity for Crime, Fear of Crime, Anti-Social Behaviour (ASB), Nuisance and Conflict.

There is a carbon cost for crime and new developments give an opportunity to address it. Using CPTED along with attaining an SBD award using SBD guidance, policies and academic research would be evidence of the applicants' efforts to design out the opportunity for crime.

We recommend SBD guidance is utilised to address designing out crime to show a clear audit trail for Designing Out Crime, Crime Prevention and Community Safety and to meet our Local Authority statutory duties under Section 17 of the Crime and Disorder Act 1998. The points below identify my recommendations for the layout and design of this scheme.

1. Due to the proposed use of the site, we would recommend the applicant review current site security and boundary treatments. We advise boundary treatments to be a minimum of 1.8m in height with support beams facing inwards. Any alleyways/ side entrances must have secure side gates, which are lockable from both sides, located flush to the front building line to optimise surveillance to prevent anyone other than residents from accessing the communal garden.
2. Parking - Where unavoidable, the car parking area must be covered by natural surveillance from an "active" window e.g. reception or offices and sufficient lighting. In addition, we recommend CCTV and appropriate signage to avoid conflict and misuse.
3. For cycle storage, we advise on the use of ground/ wall SBD or solid secure anchors within a lockable shed or storage area. Bin storage must also be secure with access control for employees only.
4. All external doorsets (a doorset is the door, fabrication, hinges, frame, installation and locks) to meet PAS 24: 2022 UKAS certified standard, STS 201 or LPS 2081 Security Rating B+.
5. For the main communal doors audio/visual door entry systems are required if the receptionists are not within direct view of the doors.
6. Windows on the ground floor or potentially vulnerable e.g. from flat roofs or balconies to meet PAS 24: 2022 UKAS certified standard, STS 204 Issue 6:2016, LPS 1175 Issue 8:2018 Security Rating 1/A1, STS 202 Issue 7:2016 Burglary Rating 1 or LPS 2081 Issue 1.1:2016 Security Rating A. Glazing to be laminated. Toughened glass alone is not suitable for security purposes. I would strongly recommend that the ground floor be used only for communal

spaces and staff areas to avoid anyone outside being able to look in. If this is unavoidable, bedroom windows on the ground floor require a defensive treatment to deflect loitering, this can be achieved via planting of prickly plants or knee rails outside of windows. We also recommend film be installed on the windows for the privacy of the care home residents against users of green areas.

7. Lighting. Please note, whilst we are not qualified lighting engineers, any lighting plan should be approved by a professional lighting engineer (e.g. a Member of the ILP), particularly where a lighting condition is imposed, to help avoid conflict and light pollution. Bollard lighting should be avoided, SBD Residential (Homes) Guide 2025 states "19.3 SBD does not advocate the use of bollard lighting to achieve lighting uniformity. Bollard lighting is purely for wayfinding and can be easily obscured or damaged. It should be avoided, as it can increase the fear of crime, because it does not project sufficient light at the right height to recognise facial features." Lighting of all roads including main, side roads, cul de sacs and car parking areas should be to BS5489-1:2020 in accordance with SBD and the British Parking Association (BPA) Park Mark Safer Parking Scheme specifications and standards.
8. Access Control and Security Compartmentalisation— For the main communal doors audio/visual door entry systems controlled by reception are required to prevent unauthorised access. It is vital that members of the public cannot freely walk around the building, they must be let in via reception and must be limited to what areas they can access without a member of staff present.
9. CCTV is advised for all communal entry points to monitor who enters/ exits the premises. It would also be advisable for CCTV to be installed covering, the reception area or any waiting areas, communal spaces, any areas with limited natural surveillance such as rear of the units, utility areas/ bin stores and on the access/ exit road. We also recommend cameras in the following areas to keep users safe and monitor their movements; any stairs, emergency access doors, lifts, loading/ unloading areas, car parking areas. The CCTV must not infringe any lighting plan.
10. Public Footpaths should be at least 3 metres wide to allow people to pass without infringing personal space and to accommodate passing wheelchairs, cycles and mobility vehicles. Consideration should be given to the provision of informal association spaces for members of the community, particularly young people.
11. Planting. We would recommend dense / prickly planting to ensure individuals stay on pedestrian routes, and not create desire lines. or spaces where potential offenders can hide from view.
12. Any current or new trees should help protect and enhance security without reducing the opportunity for surveillance or the effectiveness of lighting. Tall slender trees with a crown of above 2m rather than low crowned species are more suitable than "round shaped" trees with a low crown. New trees should not be planted within parking areas or too close to street lighting. Any hedges should be no higher than 1m, so that they do not obscure vulnerable areas.

If approved, site security is required for the construction phase. There is a duty for the principle contractor "to take reasonable steps to prevent access by unauthorised persons to the construction site" under the Construction (Design and Management) Regulations 2007. The site security should incorporate plant, machinery, supplies, tools and other vehicles and be site specific to geography and site requirements.

We welcome a discussion with the applicant/agent about site specific designing out crime. If the points above are not addressed, they can affect the development and local policing.

This information is provided by Kent Police DOCO's and refers to situational crime prevention. This advice focuses on CPTED and Community Safety with regard to this specific planning application.

Yours sincerely,

**DOCO.**

Designing Out Crime Officer

Strategic Prevention Command